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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KEVIN RISTO, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

SCREEN ACTORS GUILD-
AMERICAN FEDERATION OF
TELEVISION AND RADIO
ARTISTS, a Delaware corporation;

Case No. 2:18-cv-07241-CAS-PLA

Class Action

**JOINT STIPULATION TO
CONTINUE PRETRIAL SCHEDULE**

Complaint filed: June 22, 2018

Amended complaint filed: November 11,
2018

1 AMERICAN FEDERATION OF
2 MUSICIANS OF THE UNITED
3 STATES AND CANADA, a California
4 nonprofit corporation; RAYMOND M.
5 HAIR, JR., an individual, as Trustee of
6 the AFM and SAG-AFTRA Intellectual
7 Property Rights Distribution Fund;
8 TINO GAGLIARDI, an individual, as
9 Trustee of the AFM and SAG-AFTRA
10 Intellectual Property Rights
11 Distribution Fund; DUNCAN
12 CRABTREE-IRELAND, an individual,
13 as Trustee of the AFM and SAG-
14 AFTRA Intellectual Property Rights
15 Distribution Fund; STEFANIE TAUB,
16 an individual, as Trustee of the AFM
17 and SAG-AFTRA Intellectual Property
18 Rights Distribution Fund; JON JOYCE,
19 an individual, as Trustee of the AFM
20 and SAG-AFTRA Intellectual Property
21 Rights Distribution Fund; BRUCE
22 BOUTON, an individual, as Trustee
23 of the AFM and SAG-AFTRA
24 Intellectual Property Rights
25 Distribution Fund; and DOE
26 RESPONDING PARTY 1-10,

27 Responding Party.
28

1 Plaintiff Kevin Risto (“Plaintiff”) and Defendants Screen Actors Guild-
2 American Federation of Television and Radio Artists (“SAG-AFTRA”), American
3 Federation of Musicians of the United States and Canada (“AFM”), Raymond M.
4 Hair, Jr., Tino Gagliardi, Duncan Crabtree-Ireland, Stefanie Taub, Jon Joyce, and
5 Bruce Bouton (collectively “Defendants”), by and through their respective counsel
6 of record, stipulate and jointly request that the Court continue the pretrial schedule
7 in accordance with the dates proposed below.

8 1. WHEREAS, the Court entered a Stipulated Scheduling Order on
9 October 8, 2019, which revised the initial Scheduling Order entered by the Court
10 on February 11, 2019, to allow time for the parties to pursue settlement discussions
11 and mediation.

12 2. WHEREAS, since entry of the revised Stipulated Scheduling Order,
13 the Parties have continued to be actively engaged in discovery.

14 3. WHEREAS, Defendants have completed their review of well in excess
15 of 100,000 documents identified in response to the custodians and search terms
16 agreed upon in meet-and-confer discussions among counsel. Defendants have
17 produced more than 40,000 pages of documents to date and are nearing the end of
18 their production in response to Plaintiff’s document requests, which will include the
19 production of Defendants’ privilege log. Plaintiffs have meanwhile completed their
20 production in response to Defendants’ document requests.

21 4. WHEREAS, both Parties have also engaged in third-party discovery
22 since entry of the Stipulated Scheduling Order, including multiple subpoenas issued
23 by Defendants on non-parties (Transparence Entertainment Group, Dennis Dreith,
24 Shari Hoffman, and Bruce Wayne), as well as a subpoena served by Plaintiff on
25 Miller Kaplan Arase LLP, an accounting firm that has advised the AFM & SAG-
26 AFTRA Intellectual Property Rights Distribution Fund, and are in the process of
27 meeting and conferring regarding the scope of those subpoenas.

5. WHEREAS, the Parties have sought and received judicial resolution regarding discovery disputes through motion practice before the Honorable Magistrate Judge Paul L. Abrams, which resulted in an order issued by Magistrate Judge Abrams on January 8, 2020.

6. WHEREAS, the Parties have engaged in informal settlement discussions since the entry of the Stipulated Scheduling Order, but have yet to engage in formal mediation proceedings.

7. WHEREAS, counsel for Plaintiff has been engaged in a two-month, multi-phase trial in the Superior Court for the County of San Diego which is now near completion, which has had the effect of delaying the commencement of formal mediation proceedings.

8. WHEREAS, the Parties request additional time to pursue settlement discussions and engage in mediation proceedings.

9. WHEREAS, in light of the foregoing, the parties jointly propose, subject to Court approval, that the Court vacate the Status Conference currently scheduled for February 24, 2020, and issue a revised Scheduling Order to continue the dates previously set by the Court as follows:

Event	Current Date	Proposed Date
Settlement Completion Cutoff	January 31, 2020	April 30, 2020
Status Conference re Settlement	February 24, 2020 11:00 a.m.	May 18, 2020 11:00 a.m.
Class Certification Motion Cutoff	March 23, 2020	June 29, 2020
Opposition to Class Certification Motion Cutoff	April 27, 2020	August 3, 2020
Reply to Class Certification Motion Cutoff	May 22, 2020	August 28, 2020
Hearing on Motion for Class Certification	June 8, 2020 10:00 a.m.	September 14, 2020 10:00 a.m.

Joint Status Report Cutoff	June 29, 2020	September 28, 2020
Further Scheduling Conference	July 6, 2020 11:00 a.m.	October 5, 2020 11:00 a.m.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Respectfully submitted,

Dated: February 18, 2020

JENNER & BLOCK LLP

/s/ Andrew J. Thomas

Andrew J. Thomas

Andrew G. Sullivan

Attorneys for All Defendants

Dated: February 18, 2020

KIESEL LAW LLP

/s/ Mariana A. McConnell

Paul R. Kiesel

Mariana A. McConnell

Dated: February 18, 2020

JOHNSON & JOHNSON LLP

/s/ Jordanna G. Thigpen

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